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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CORRY ALEXIS HAWKINS,

Petitioner,

v.

CALVIN JOHNSON, *et al.*,

Respondents.

Case No. 2:20-cv-01852-CDS-VCF

**UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO FILE
RESPONSE TO SECOND AMENDED
PETITION FOR WRIT OF HABEAS
CORPUS (ECF NO. 22)**

(SECOND REQUEST)

Respondents move this Court for an enlargement of time of 45 days from the current due date of June 2, 2022, up to and including July 18, 2022¹, in which to file their Response to Hawkins' Second Amended Petition for Writ of Habeas Corpus (ECF No. 22). This Motion is made pursuant to FED. R. CIV. P. 6(b) and Rule 6-1 of the Local Rules of Practice and is based upon the attached declaration of counsel.

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¹ 45 days from June 2, 2022, is Sunday, July 17, 2022, making Monday, July 18, 2022, the final day for Respondents to file their Response.

1 This is the second enlargement of time sought by Respondents and is brought in good faith and
2 not for the purpose of delay.

3 DATED June 2, 2022

4 Submitted by:

5 AARON D. FORD
6 Attorney General

7 By: /s/ Katrina A. Samuels
8 Katrina A. Samuels (Bar No. 13394)
9 Deputy Attorney General
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DECLARATION OF KATRINA A. SAMUELS

I, Katrina A. Samuels, being first duly sworn under oath, depose and state as follows:

1. I am an attorney licensed to practice law in all courts within the State of Nevada and am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. I have been assigned to represent Respondents in *Corry Alexis Hawkins. v. Calvin Johnson, et al.*, Case No. 2: 20-cv-01852-CDS-VCF, and as such, have personal knowledge of the matters contained herein.

2. This Motion is made in good faith and not for the purpose of delay.

3. The Response to Hawkins' Second Amended Petition is currently due on Thursday, June 2, 2022.

4. Respondents have been unable with due diligence to timely complete the Response.

5. In the past few months, Respondents filed a response to motion to provide justice court records filed April 7, 2022 (*Christopher Lenard Blockson v. Jerry Howell, et al.*, Case No. 2:21-cv-00731-GMN-VCF); a motion to dismiss filed April 22, 2022 (*Derrell Lee Christy, Jr. v. William Hutchings*, Case No. 2:21-cv-00132-APG-BNW); a response to a motion to strike filed May 2, 2022 (*Slater Lance Yohey v. Perry Russell, et al.*, Case No. 3:20-cv-00441-ART-CLB); a renewed motion to dismiss filed May 2, 2022 (*Slater Lance Yohey v. Perry Russell, et al.*, Case No. 3:20-cv-00441-ART-CLB); an answering brief in the Ninth Circuit filed May 9, 2022 (*John Michael Farnum v. Robert Legrand, Warden; Attorney General for the State of Nevada*, Case No. 21-15529); an opposition to motion for recusal (*Justin Odell Langford v. Warden Renee Baker, et al.*, Case No. 3:19-cv-00594-MMD-CSD); an opposition to motion to reconsider motion to amend petition (*Justin Odell Langford v. Warden Renee Baker, et al.*, Case No. 3:19-cv-00594-MMD-CSD); a reply in support of motion to dismiss filed May 31, 2022 (*Markiece Palmer v. William Gittere, et al.*, Case No. 3:18-cv-00245-HDM-CLB); and various responses in state post-conviction cases.

6. Additionally, on May 31, 2022, undersigned counsel tested positive for COVID and was advised by the Southern Nevada Health District that she must not return to the office until after June 9, 2022, when she is no longer infectious. The undersigned has not been in the office this week and has not worked from home in over a year. In addition to her own illness, which has caused a drastic reduction in hours worked each day, counsel is also dealing with an ill spouse in the home.

8. Based on the forgoing, Respondents respectfully request an enlargement of time of 45 days from the current due date, June 2, 2022, up to and including July 18, 2022, to file our Response to Hawkins' Second Amended Petition.

Executed on June 2, 2022.

/s/ Katrina A. Samuels
Katrina A. Samuels (Bar No. 13394)
Deputy Attorney General

IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

Dated: June 2, 2022

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing *Unopposed Motion for Enlargement of Time to File Response to Second Amended Petition for Writ of Habeas Corpus (ECF No.22) (Second Request)* with the Clerk of the Court by using the CM/ECF system on June 2, 2022.

The following participants in this case are registered CM/ECF users and will be served by the CM/ECF system:

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Counsel for Petitioner

/s/ J. Gochuico
An employee of the Office of the Attorney General